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AUG 24 1992

Sheriff

James R. Metts, Ed. D.



Federal Communications Commission
Office of the Secretary

LEXINGTON COUNTY SHERIFF'S DEPARTMENT

August 5, 1992

The Honorable Alfred C. Sikes, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: CC Docket No. 92-77

Dear Chairman Sikes:

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AUG 11 11 26 AM '92
INFORMAL COMPLAINTS
BRANCH
ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

I understand that you are to consider the referenced proposal which would change the way long distance carriers are selected on collect calls from county jails. It would eliminate private industry from inmate phone service. Please note my opposition to the proposal as it stands now. Controlled access pay telephones should be exempt from being required to provide Billed Party Preference access to all carriers.

Lexington County Detention Center would be one facility that would have to revert to using pay phones. We are in the Alltel area and they do not offer a totally collect call system. I tried in 1984 to go through Alltel, but did not receive a favorable response. I then tried to get Southern Bell to bring their system into our Detention Center, but they refused stating they could not go into another company's area.

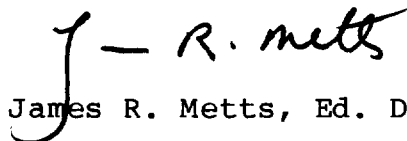
Since going with a private vendor to install an inmate telephone system, I have experienced fewer problems with inmate calls. If we have to go back to using pay phones we will experience harassing phone calls, fraud, threatening calls to victims and witnesses and any other scam that inmates concoct on a daily basis.

In South Carolina the Bell System would have you believe that they can provide operator assisted services that will do better than our computerized based phones. We have experienced operators who do not recognize that the phone call is coming from a Detention Center and will charge calls to unauthorized phone numbers and will do third party billing without proper authorization.

Alfred C. Sikes
08/04/92
Page 2

These are just a few problems that we face in our Detention Centers when we are forced to use a system that has proved it cannot work. We appreciate your considering our concern in this matter. If we can be of assistance in this matter, please contact Captain Adrian Bost at (803) 951-8514.

Sincerely yours
in effective law enforcement,


James R. Metts, Ed. D.
/kdf

cc: The Honorable Sherrie Marshall
The Honorable Andrew C. Barrett
The Honorable James H. Quello
The Honorable Ervin S. Duggan
Mr. Gary Phillips-Connor, Carrier Bureau



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INFORMAL COMPLAINTS
BRANCH
ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

August 4, 1992

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AUG 24 1992

The Honorable Alfred Sikes, Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

Re: Billed Party Preference CC Docket No. 92-77

Dear Chairman Sikes:

Our office is responsible for procuring and overseeing the operation of telecommunications facilities and services for the City of Charlotte, including pay telephones and other telephone systems located at our facilities. In this capacity we have secured contracts which produce substantial income that benefits our organization. Following an open and competitive solicitation for proposals, we entered into contracts with LDDS Communications Inc. to provide long distance operator service from our pay telephones at our facilities. This agreement calls for the payment of commissions to us based on total billed revenues. The calls are charged to the consumer at regulated "AT&T" "MCI" etc. rates with no extra surcharges.

All of our phones are programmed to be in compliance with the Telephone Operator Consumer Services Improvement Act of 1990 (TOCSIA) to allow callers to access the carrier of their choice. However, we believe the FCC should mandate compensation on these calls.

We do not believe a case has been made to require mandatory Billed Party Preference (BPP). The consumers now have the right to access the carrier of their choice through a plan already approved by Congress (TOCSIA). How can the FCC justify the extremely high costs of implementing BPP, in addition to the massive indirect costs imposed on others that would result from mandatory imposition of Billed Party Preference. Any cost is more than Congress has authorized the FCC to force rate payers to spend on a compulsory mechanism that is superfluous and inconsistent with the access code system that Congress has already mandated.

Page 2
July 3, 1992
The Honorable Alfred Sikes

Our concerns are in five areas:

- 1) Has the FCC addressed the high risk for increased fraud that will occur with Billed Party Preference? In the state of North Carolina there are 28 telephones companies. How will BPP work when the majority of the non-Southern Bell telephone companies do not provide enhanced screening options to prevent fraud. In addition to this problem, several long distance companies in North Carolina do not have enhanced screening options. The net effect would appear to greatly increase the potential for excessive fraud that would ultimately have to be paid by consumers.
- 2) BPP does not give consumers any greater ability to access their carrier of choice.
- 3) BPP will impose new and unnecessary cost and inconvenience on consumers. BPP will cost millions to implement and will have continuing costs that consumers must ultimately bear. In addition, consumers will be faced with longer call set up times on calls and will need to repeat billing information to two operators on some calls.
- 4) Competition and Innovation will be eliminated by BPP. Prior to competition from private payphones and operator service providers commissions were either non-existent or very small. Competition has brought new service options, greater responsiveness to our needs and fair commission structures. BPP will grant local telephone companies bottleneck control over the initiation and routing of 0+ calls and enable them to further their own objectives at the expense of our service flexibility and profit opportunities.
- 5) BPP will eliminate our ability to choose a primary operator service provider. This will eliminate a source of income that has enabled us to justify our investment in space, equipment, and maintenance to provide phone service to the public.

Our providing payphones is a service to citizens; as well as, a service to interchange carriers. Our airport relies on commissions from these payphones, as it would require from any vendor using our space at the airport. We feel that all carriers that benefit from our providing the public access to their long distance services should compensate the City of Charlotte for that access (this includes the primary carrier as well as carriers benefiting from dial-a-round traffic).

Page 3
July 3, 1992
The Honorable Alfred Sikes

Although on its face Billed Party Preference seems appealing, it suffers from numerous flaws. We respectfully ask the Commission to not grant Bell Atlantic's petition for Bill Party Preference. The Commission should not consider Bill Party Preference until these issues are addressed and resolved:

- 1) No increase in cost to the public
- 2) Fraud can be curtailed
- 3) Commissions can be guaranteed

Thank you for your time and consideration.

Respectfully submitted,



R. L. Passine
CIS Director

cc: Honorable Sherri Marshall
Honorable Andrew C. Barrett
Honorable James H. Quello
Honorable Ervin S. Duggan
Senator Terry Sanford
Senator Jesse Helms
Congressman Alex McMillan

RLP/vlt

CCD 92-77



STATE OF MISSISSIPPI
DEPARTMENT OF CORRECTIONS
EDDIE LUCAS
COMMISSIONER

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Federal Communications Commission
Office of the Secretary

August 4, 1992

Honorable Alfred C. Sikes, Chairman
Federal Communications Commission
1919 M. Street, N.W.
Washington, D.C. 20554

RE: CC Docket No. 92-77

Dear Mr. Sikes:

The Mississippi Department of Corrections desires to go on record opposing Billed Party Preference for Inmate Phone Service. We concur with the comments filed in this cause by the South Carolina Jail Administrators Association and the Arizona Department of Corrections.

If you desire any further input, please feel free to contact our agency.

Sincerely,

Eddie Lucas

Eddie M. Lucas
Commissioner

pc: Honorable Sherrie Marshall
Honorable Andrew Barnett
Honorable James Quello
Honorable Ervin Duggan
Mr. Gary Phillips, Common Carrier Bureau



South Carolina Correctional Association

P.O. Box 210603

Columbia, South Carolina 29221

July 30, 1992

INFORMAL COMPLAINTS
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ENFORCEMENT DIVISION
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AUG 24 1992

Federal Communications Commission
Office of the Secretary

OFFICERS

William D. Catoe, President
Department of Corrections

Judy C. Anderson, President-Elect
Department of Corrections

Robert W. Donlin, Vice-President
Department of Corrections

Norma J. Hubbard, Secretary
Department of Corrections

Donna B. Hodges, Treasurer
Department of Corrections

Board Of Directors

Flora B. Boyd, Past President
Department of Corrections

Rhonda K. Obermeier, Adult Corrections
Department of Corrections

John Kinchens, Juvenile Corrections
Department of Youth Services

Gwendolyn A. Bright, Adult Probation and Parole
Probation, Parole and Pardon Services

Larry Mitchell, Community-Based Programs
Alston Wilkes Society

Kitty T. Speed, Chapter Affiliates
Department of Corrections

Joann B. Morton, Education
USC College of Criminal Justice

Herman Young, Jails/County Detention
Fairfield County Detention Center

James R. Metts, Law Enforcement
Lexington County Sheriff's Department

Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M Street, N W Room 222
Washington, D.C. 20554

RE: "Billed Party Preference" Proposal, CC
Docket 92-77

Dear Ms. Searcy,

The South Carolina Correctional Association (SCCA) consists of correctional professionals, individuals, agencies and organizations involved in all aspects of federal, state, county and municipal corrections. We have over 800 members throughout South Carolina.

It is my understanding that the Federal Communication Commission is now considering a proposal called "Billed Party Preference", Docket 92-77. As I understand it, this proposal will change the way the long distance carrier is chosen on collect calls from correctional facilities.

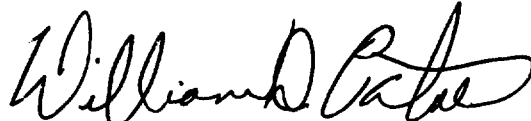
The Association opposes this proposal for the following reasons:

- 1) The potential for excessive telephone fraud causing increased financial burden on the public and potential public relations problems in correctional facilities.
- 2) The ability to get special services (call blocking, phone number searches, etc.) that are often not provided by local telephone companies.
- 3) Loss of revenue from commissions which are used to fund administrative and operational expenses as well as special programs for inmates (education, recreation etc.) These programs would often not be funded without present revenues.
- 4) The possibility of a loss in security and control now created by inmate phone service.

Ms. Donna Searcy
July 30, 1992
Page 2

I urge the Commission to carefully consider each of these issues and their effect on control and monitoring of long distance calls within correctional facilities.

Sincerely,

A handwritten signature in black ink, appearing to read "William D. Catoe". The signature is fluid and cursive, with the first name "William" being the most prominent.

William D. Catoe
President

WDC:pbh

Attachment

CC: The Honorable Alfred C. Sikes
The Honorable Sherrie Marshall
The Honorable Andrew C. Barrett
The Honorable James H. Quello
The Honorable Ervin S. Duggan
Mr. Gary Phillips
The Honorable Strom Thurmond
The Honorable Earnest Hollings
The Honorable Arthur Ravenel, Jr.
The Honorable Floyd Spence
The Honorable Butler Derrick
The Honorable John Spratt, Jr.
The Honorable Robin Tallon
The Honorable Elizabeth Patterson

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Federal Communications Commission
Office of the Secretary

INDUSTRY CONCERNS WITH PRISON FRAUD

LARRY KEPFER
CO-CHAIRMAN OF THE NATIONAL
TOLL FRAUD PREVENTION COMMITTEE

I. OVERVIEW

Institutional toll fraud presently generates an annual loss of \$150 million according to the Communications Fraud Control Association (CFCA), a national association of IXCs, LECs, and law enforcement representatives. Included in the category of institutional toll fraud are educational facilities, military institutions, and prisons. Local exchange carriers and interexchange carriers have sought to minimize the fraud from inmate facilities through the provision of inmate service. Inmate service does not typically allow calls such as third party bill, access to Feature Group B (950) or Feature Group D (10XXX), 800 calls, 900 calls, 976 calls, direct dialed local calls, and credit card calls. Nonetheless, inmates still perpetrate fraud by using deceptive means to "Get By" the operator and access either services that require authorization codes (PINs or credit card numbers) or unsecured lines which give second dial tone.

II. WAYS FRAUD IS PERPETRATED BY INMATES.

A. PBX FRAUD

An example of PBX fraud is where an inmate calls a hospital and tells the operator "collect call from Dr. Jones." The PBX operator then accepts the call. The inmate will then ask for a department (i.e. radiology). When the department answers, he will explain that he was directed to the wrong department and requests to be connected to the operator again. When the operator is reconnected, he then asks for an outside line and dials his fraudulent call.

B. UNSECURED LINES and SECURED WATS LINES

Many large businesses have WATS lines that are dial accessed by their personnel. Some of these lines have authorization codes associated (secured lines), others just return a second dial tone when they are accessed (unsecured lines). The inmates will dial these numbers, tell the operator the call is from "John" and when the conformation or second dial tone is returned, the inmate will send a burst of DTMF to kill the tone before the

operator can hear it. They, in turn, either disguise their voice or hand the phone to another inmate who accepts the call. The Operator drops off and the inmate population has access to the dial facilities. If the line is secured, the inmates may "hack" the code until a valid authorization code is found or obtain a code via outside sources. They will have the ability at this point to dial their call on unsecured lines.

C. FEATURE GROUP A

Feature Group A fraud is perpetrated like the secured WATS lines. The inmates get to the carriers' facilities using the deceptive means previously mentioned, then input a stolen PIN and dial their call. Some Feature Group A lines also have the ability to reoriginate calls by using the # key. On completion of a call, the calling party presses the # key and the Feature Group A line returns dial tone and another call can be made without reentering the PIN. Unlimited numbers of calls can be made in this manner. To the LEC, it appears as only one call was made.

III. POTENTIAL HARM

A. CREDIT CARD CALLING

1. Inmates have many ingenious ways of illegally obtaining authorization codes, PINS, and Credit Card numbers. Allowing an inmate to make credit card calls would make the serving LEC and all IXCs very susceptible to fraud.
2. If an inmate were permitted to have a legitimate credit card, the card could easily be compromised within that facility. That inmate could sell calls to other inmates then report his card stolen.
3. Subscription Fraud (where a person orders service, runs up a large toll bill, then disappears without paying) would be a possibility where an outside source would order service under an assumed name, order a calling card, give the information to an inmate, then disappear. In the interim, the inmates could run up large volumes of fraud.

B. THIRD NUMBER BILLED

Third number billed calls would give an inmate an unlimited opportunity to place fraudulent calls with the

cooperation of friends at remote phones or other inmates. These calls could later be identified by the billed party as fraudulent at the expense of the LEC or IXC.

C. LOCAL CALLING

Allowing inmates to make local calls without operator control or without controlling the number of digits that they could dial, would give them access to local Feature Group A lines, dial access WATS lines, and also make the PBX fraud easily perpetrated. They would now be able to dial into the PBX without going through the operator and having a collect call accepted.

D. 1+ SENT PAID

Allowing 1+ sent paid traffic would also require controlling the number of digits the inmate could dial. With this stipulation, the potential for fraud would be minimized.

E. 0+ SENT PAID

Allowing 0+ sent paid traffic necessitates control of the 54 coin drop function at the coin set. Of course, this function is not under the operator's control, making 0+ sent paid calls totally unworkable from COCOT sets. Even at a LEC operated coin phone, an inmate could get the receiving caller at another coin set location to drop the coins at the receiving coin set. At those locations not utilizing electronic means to monitor and detect the point of origin of the coin deposit tones, the operator would be unaware that the coins were being deposited in the receiving set rather than by the inmate at the originating set. When a coin control signal is sent to collect the coins, it is applied only against the set originating the call. The receiving set would simply drop the coins back through to the coin return slot upon disconnect. When actual money in the collection box (originating set) is compared to the expected revenue (generated from AMA records), the shortage would be identified. Since it cannot be determined which calls created the shortage, recovery of this loss through rebill is impossible.

F. 10XXX DIALING

Allowing 10XXX dialing from inmate lines would make Interexchange Carriers, who cannot separate this type of traffic from POTS traffic, "fair game" for fraud. Some

DEPARTMENT OF CORRECTIONS

P. O. Box 942883
Sacramento, CA 94283-0001

August 3, 1992

The Honorable Alfred C. Sikes, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: CC Docket No. 92-77

Dear Mr. Chairman:

We are in receipt of information from the American Public Communications Council regarding "Billed Party Preference" (BPP) Docket No. 92-77. In our opinion, the BPP should not apply to inmate calling services.

Correctional facilities are unique in a variety of ways and require special consideration concerning inmate calling services. Methods by which inmate calling is accomplished must not jeopardize security, must provide inmates with reasonable access to telephones and must assist in preventing criminal activity. Technology is now allowing specialized services to intervene on behalf of the institution staff, reducing the need for increased staff, and still provide inmate calling services. Items such as blocking inbound calling; blocking 800, 900, 976, 411 and repair services; providing monitoring and recording capabilities for the detection of criminal activity; and announcing the calling party without the inmate on the line have all contributed to an efficient and cost effective system that provides a good level of service and meets the security needs of the prison.

We are extremely concerned that the required services cannot be met by all service providers.

In addition to security and operational concerns, we have a fiscal concern. In a competitive environment, increasing amounts of revenues are available to the State General Fund through the Request for Proposal (RFP) process. This process has brought to the State of California in excess of \$6 million over the last fiscal year. We have just completed a new RFP and can project an increase of \$1 to \$2 million to that amount. In the current economic condition, it would not be fiscally prudent to eliminate this source of income to government.

We believe that the unblocking of 10XXX-0+ codes and the availability of 1-800 and 950 access numbers on coin and card stations eliminates the need for BPP.

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Federal Communications Commission
Office of the Secretary

The Honorable Alfred C. Sikes
Page 2

Also, as you are no doubt aware, the Federal Communications Commission (FCC), in the Report and Order adopted April 9, 1991 (CC Docket No. 90-313), expressly omitted inmate telephones from the Equal Access requirement. The FCC wrote that the definition of "aggregator" does not apply to correctional institutions in situations where they provide inmate-only telephones. Clearly this should apply in the case of BPP also.

Sincerely,

A handwritten signature in cursive script that reads "Sandra Duveneck".

SANDRA DUENECK, Chief
Office of Telecommunications
Construction Support Branch
Planning and Construction Division



County of Greenville

"Striving for Excellence"

Criminal Justice Support Department

August 4, 1992

92-77
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The Honorable Alfred C. Sikes, Chairman
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

Dear Mr. Sikes

AUG 24 1992

RE: Comments of the South Carolina Jail Administrator's Association
Federal Communications Commission
Office of the Secretary

Regardless of the potential loss of funds, if Billed Party Preference is allowed in local detention facilities, the potential for fraud, increased manpower requirements, elimination of inmate communication, and general disruption of the smooth and orderly management of the jails are more than sufficient reasons for Billed Party Preference not to be allowed with regards to phone service in correctional institutions.

Contrary to popular opinion, inmate phone services are not a constitutional right allowed to prisoners. The development of these phone services, while probably originally based on a profit motive to the developing phone companies, were eagerly accepted by jail administrators as an aid to the management of their inmate population. Constant inmate access to telephones was not only beneficial to the inmates, but greatly reduced the manpower and workload required for the officers. Inmates, especially pre-trial inmates, have a right to communication, particularly with individuals who may aid in their defense. This communication prior to the installation of inmate phone services, was severely limited due to availability of telephones and security personnel to escort individuals to the phones. Additionally, inmate unrest was at a far higher level because of uncertainty as to their situation with regards to family matters and other concerns a normal individual would have pertaining to the outside world.

One of the common complaints and basis for lawsuits by prisoners was an interpretation of the amount of communication that they were allowed with those outside the jail. Installation of the inmate phone service eliminated almost all these complaints. If Billed Party Preference is allowed, because of the potential for fraud, inability to block phone calls that may be criminal in nature, increased security concerns, and general lack of responsiveness from the companies involved in the Billed Party Preference System, most jail administrators will eliminate inmate phone services to insure their security and control of possible criminal activity and fraud through use of the phone systems.

The Honorable Alfred C. Sikes

2

Additionally, the lost of communications, which generally are restricted to the use and welfare of the inmates, will have severe impact on the operation of these facilities.

The Association is unilaterally opposed to Billed Party Preference. Request that it not be allowed, particularly with regards to correctional and detention facilities.

The Association speaks for 66 members who represent all of the detention facilities within the State of South Carolina.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Perry R. Eichor', written over a horizontal line.

Perry R. Eichor
DIRECTOR

PRE/fgh

CHASE RIVELAND
Secretary



STATE OF WASHINGTON
DEPARTMENT OF CORRECTIONS

P.O. Box 9699, MS: FN-61 • Olympia, Washington 98504 • TEL: (206) 753-1573
FAX Number: (206) 586-3676 SCAN 321-3676

July 28, 1992

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INFORMAL COMPLAINTS
BRANCH
ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

The Honorable Alfred C. Sikes, Chairman
Federal Communications Commission
1919 M. Street, N.W.
Washington D.C. 10554

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AUG 24 1992

SUBJECT: Docket CC 92-77

Federal Communications Commission
Office of the Secretary

Dear Chairman Sikes:

On behalf of the Washington State Department of Corrections, I respectfully request the Federal Communications Commission specifically exempt inmate telephone services from requiring Billed Party Preference, no matter what other decisions may be decided in this rulemaking.

There is significant federal precedent to support excluding inmate telephone services from Billed Party Preference. It was specifically excluded from the Telephone Operator Consumer Services Improvement Act of 1990 (TOCSIA), passed by Congress. The Act requires that all payphones allow callers to be able to reach the long distance carrier of their choice by dialing access codes.

Correctional facilities are unique and I respectfully request the FCC continue to recognize the difference. Institutions must maintain security, prevent criminal activity such as telephone harassment, fraud, and abuse of the telephone system.

In addition, the loss of commissions, which are put in the Inmate Welfare Fund and used only for the inmates, would severely curtail the level of services currently being provided to the inmate population.

Correctional facilities must be able to manage inmate telephone services in order to provide security and safety to staff, inmates, and the public at large.

Sincerely,

John King, Director
Division of Management and Budget

JK:ssst

cc: The Honorable Sherrie Marshall
The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Ervin S. Duggan
Mr. Gary Phillips, Common Carrier Bureau



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INFORMAL COMPLAINTS
BRANCH
ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

July 29, 1992

The Honorable Alfred C. Sikes
Chairman
Federal Communications Commission
1919 M. Street, NW
Washington, DC 20554

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AUG 24 1992

RE: Billed Party Preference/CC Docket No. 92-77

Federal Communications Commission
Office of the Secretary

Dear Chairman Sikes:

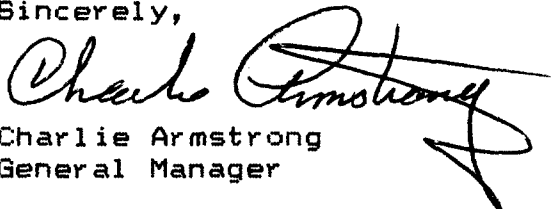
I have reviewed the contents of CC Docket #92-77, and believe this proposed rule would not serve the public interest. It would, in my opinion, add an additional step in the calling process which, inevitably, would add to the cost of making a call and, therefore, be passed on to me the consumer.

I understand that the idea behind this proposal is to protect me the consumer, and appreciate the efforts; however, over the past few years, the problem of reaching my preferred carrier seems to have been eliminated. As a reference, I travel around the country extensively, and cannot recall the last time I was denied access to my preferred carrier.

I believe the current system affords me convenient access to my preferred carrier, and any change would only add to my cost of making calls. As the old adage goes "If it ain't broke, don't fix it".

Thank you for your consideration.

Sincerely,



Charlie Armstrong
General Manager

ABLOY SECURITY GROUP

Abloy Security, Inc.

Mailing Address
P.O. Box 35406
Dallas, Texas 75235

Shipping Address
6200 Denton Drive
Dallas, Texas 75235

Telephone
(214) 358-4762
(800) 367-4598

Facsimile
(214) 353-0273



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(205) 585-2216

DISTRICT OFFICE
2310 Montgomery Hwy.
Dothan, AL 36303
(205) 792-5179

August 3, 1992

The Honorable Alfred C. Sikes
Chairman
Federal Communication Commission
1919 M Street, NW
Washington, D.C. 20554

RE: Billed Party Preference/CC Docket # 92-77

Dear Chairman Sikes:

After reviewing the information regarding the above referenced proposed ruling, it appears to be an effort to fix something that is not broken.

Federal Communications Commission
Office of the Secretary

When Judge Greene ruled to deregulate a monopoly seven years ago, it served to provide good service to the general public through increased and improved services. The payphones installed on our property already allow customers to reach their preferred long distance carrier and we have regulations from the State Public Utility Commission and the FCC that ensures access will not be blocked. Implementing billed party preference will only return the monopoly that created the public interest problems that existed before regulation.

Do not take away the rights that have allowed my company increased revenues and quality service that my customers have come to enjoy. In my opinion, the present system allows our customers to reach the carrier of their choice and does not need fixing.

Thank you for your consideration.

Sincerely,

Pate Weems
Pate Weems
V. Pres.

INFORMAL COMPLAINTS
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ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

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Tennessee Sheriffs' Association, Inc.

501 UNION STREET SUITE 506 NASHVILLE, TENNESSEE 37219
MAILING ADDRESS: P.O. BOX 2990
TELEPHONE (615) 242-0409
FAX (615) 242-0414

EXECUTIVE DIRECTOR
J. IKE HILL

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AUG 24 1992

Federal Communications Commission
Office of the Secretary

July 29, 1992

Ms. Donna R. Searcy
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

RE: CC Docket 92-77
Billed Party Preference Proposal

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ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

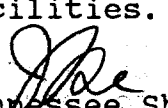
Dear Ms. Searcy:

I am writing on behalf of the Tennessee Sheriffs' Association to express our deep concern about the Federal Communications Commission's proposal to implement Billed Party Preference routing of all "0+" interLATA calls. Like many others involved in the administration of correctional facilities, the Sheriffs of Tennessee believe Billed Parties Preference would destroy our ability to properly manage inmate telephone service. Moreover, the proposal could increase the amount of telephone fraud perpetrated by inmates.

The Telephone Operator Consumer Services Improvement Act of 1990 and the Commission's regulations exempt inmate telephone service because of the obvious need to curtail inmate phone abuse. However, we are unsure whether the Commission intends to exclude inmate services from it's Billed Party Preference proposal. We believe Billed Party Preference would reduce our ability to obtain special services from inmate phone providers, such as blocking, number searching and selective call restrictions. In addition, it would diminish the increased security control provided by specialized inmate telephone service providers.

Finally, we understand that implementation of Billed Party Preference could cost well over \$1 million. Obviously, the cost of this program would be borne by all consumers, including the families of inmates.

For the reasons discussed above, any Billed Party Preference plan should exclude the provision of telephone service to correctional facilities.


Tennessee Sheriffs' Association
J. Ike Hill
Executive Director

JIH:lsc

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AUG 24 1992

ZAK INTERNATIONAL, INC

DBA Key Truck Stop
17124 I-10 East
Channelview, TX 77530
(713) 452-1043

Federal Communications Commission
Office of the Secretary

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INFORMAL COMPLAINTS
BRANCH
ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

The Honorable Alfred C. Sikes
Chairman
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

re: Billed Party Preference/CC Docket No. 92-77 ✓

Dear Sir,

After reviewing the information regarding the above referenced proposed ruling, I am in complete disagreement. Why should hundreds of millions of dollars be spent to implement a program that does nothing but fix something that does not need fixing? This program will cost far more than it is worth and will make interexchange calling less convenient than it is today.

Implementing billed party preference will only return the monopoly that created the public interest problems that existed before deregulation. A monopoly should not be allowed to exist in any form.

Do not take away the rights that have allowed my company increased revenues and the quality service that my customers have come to enjoy. In our opinion, the present system for consumers to reach the carrier of their choice is not broken, so please don't try to fix it.

Thank you for your consideration.

Sincerely,

Loren Furst

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AUG 24 1992

Federal Communications Commission
Office of the Secretary

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UNCLE CHARLIE'S
56 GREENWICH AVENUE
NEW YORK, N.Y. 10011-903 AM '92
TEL: (212)255-8787

INFORMAL COMPLAINTS
BRANCH
ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

July 13th, 1992

The Honorable Alfred C. Sikes
Chairman
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, NW
Washington, DC 20554

RE: FCC BILLED PARTY PREFERENCE IN CC DOCKET 92-77

Dear Chairman Sikes,

I am the owner of a restaurant whose has public payphone on our premises. These phones were provided to us by a local COCOT (Customer Owned Coin Operator Telephone) service company. We are proud of the level of phone service we provide to the public from our payphones. These new "smart" payphones are technologically superior to the old public phones we had from NYNEX.

Our payphones allows consumers to access their carrier of choice as required by "TOCSIA" and therefore we do not see any need for Billed Party Preference. If BPP is approved at an expense of hundred of millions of dollars to the public to implement, it will only concentrate monopoly power to the local telephone companies and giant national inter exchange carriers. Our operator service Company utilized multi lingual operators, provides voice messaging, electronic mail boxes and accepts major credit cards. Since we cater to many out-of-town visitors, these service which NYNEX does not provide is needed. Additionally BPP would eliminate our commission that we rightfully earn. We would be unable to get a return that compensates us for our investment in equipment, space and management.

This proposal must be defeated because it will adversely affect our customers, ourselves, our payphone service Company and put the competitive operator service industry out of business.

Very truly yours,

UNCLE CHARLIE'S

Gary Davenport
President

DN/al

c.c. The Honorable James H. Quello
The Honorable Sherrie Marshall
The Honorable Ervin S. Duggan
The Honorable Andrew C. Barrett
Mr. Gary Phillips, Common Carrier Bureau

Teldex Communications RECEIVED

2338 Rebecca Drive
Hatfield, PA 19440
(215) 822-6507

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INFORMAL COMPLAINTS
BRANCH
ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

Aug. 3, 1992
Hatfield, Pa.

The Honorable Alfred C. Sikes
Chairman
Federal Communications Commission
Washington, D.C.

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AUG 24 1992

Federal Communications Commission
Office of the Secretary

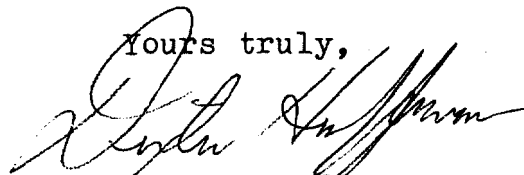
Dear Sir:

In reference to CC Docket 92-77, I feel this bill would do extreme damage not only to my business, but to the small business people who supply me locations for my pay telephones.

After making the decision to invest considerable amounts of money in the telephone industry and having a change such as "billed party preference", ago into effect, my investment would surely be lost along with intent to have a retirement income enabling me to be self supporting in my retirement years. I might add that the original intent of de-regulation would not be served with the passing of CC Docket 92-77 into law.

Please give this matter your consideration and allow me to operate my business as I was told I could before investing large sums of money into the payphone industry.

Yours truly,


Dexter Huffman
President